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July 17, 2018

Via Regular Mail

U.S. EPA, Region 5
c/o Regional Freedom of Information Officer
77 West Jackson Boulevard (MI-9J)
Chicago, IL 60604-3590

Re: FOIA Request

Dear U.S. EPA:

This is a request under the Freedom of Information Act.

We request copies of all investigations, reports, communications and/or any other documents, photographs, videos or other data in your file(s) concerning:

- 1) The chemical fire that occurred at **1303 and 1313 Campbell St. Toledo, OH 43607** on **3/2/17**; and
- 2) Any other incident, investigation or involvement with **1303 and 1313 Campbell St. Toledo, OH 43607** or any of the owners or operators of said property/properties, including:
 - a) **Lithium Innovations Company, LLC;**
 - b) **Cauffiel Corporation;**
 - c) **Toledo Industrial Center Co.;**
 - d) **Cauffiel Industries Corp.;**
 - e) **Ford B. Cauffiel; and/or**
 - f) **The American Steel Products Co.**

To avoid later requests to certify the responsive records, we have attached a certification for your convenience to be filled out and returned with any responsive records.

The certification and responsive records may be sent via fax to (567) 661-1795, via email to pborgess@borgesslaw.com or via mail to:

Borgess Law, LLC
6800 W. Central Ave. Ste. E
Toledo, OH 43617

If you have any questions or concerns regarding this request, please do not hesitate to contact me directly at (567) 455-5955. If I am not available, please ask for my paralegal, Thomas Schneider.

Thank you for your anticipated cooperation.

Respectfully,

BORGESS LAW, LLC



Pamela A. Borgess, Esq.

CUSTODIAN OF RECORDS CERTIFICATION/AFFIDAVIT

I am over the age of 18 and a duly authorized custodian of records for:

U.S. EPA, REGION 5
c/o Regional Freedom of Information Officer
77 West Jackson Boulevard (MI-9J)
Chicago, IL 60604-3590

A) CERTIFICATION OF RECORDS/MATERIALS:

- ☐ The records provided to Borgess Law, LLC are true and complete copies of all documents related to: (1) the chemical fire that occurred at 1303 and 1313 Campbell St. Toledo, OH 43607 on 3/2/17; and (2) any other incident, investigation or involvement with 1303 and 1313 Campbell St. Toledo, OH 43607 or any of the owners or operators of said property/properties, (including Lithium Innovations Company, LLC; Cauffiel Corporation; Toledo Industrial Center Co.; Cauffiel Industries Corp.; Ford B. Cauffiel; and/or The American Steel Products Co.) No documents have been withheld in order to avoid being copied. The records were made or transmitted by a person with knowledge at or near the time of the acts, conditions or events recorded and were made and kept in the ordinary course of business.

B) AFFIDAVIT OF NO RECORDS/MATERIALS, (and the following applies):

- ☐ A thorough search of our files, carried out under my direction using the specific information provided in the request revealed no responsive documents, records or other materials or images.
- ☐ All records as described in the request were destroyed/purged in accordance with our document retention policy, which maintains records for _____ years.
- ☐ Other: _____

I declare under penalty of perjury that the foregoing is true and correct:

Custodian Name (Print)

Signature of Custodian of Records

Subscribed and sworn to before this _____ day of _____, 20____.

Notary Public

My commission expires